



**COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT**

eFACTS10# 1279555

Inspection Date 10/20/03

Time Start 12:45 pm

Time Finish 1:45 pm

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name B. Braun Medical, Inc. I.D. Number PAD 982679169

Site Address 901 Marcon Blvd. Allentown, PA 18109 - 9341

County Lehigh Municipality Hanover Twp. Zip 18109

Name of Inspector Chris Smolar

Name & Title of Responsible Official Steve Stancick Environmental, Health, and Safety Manager

Person Interviewed David Lauer / Joe Patterson Telephone (610) 266-0500 x2584 / x2454

Mailing Address (if different from above) Same

Amount of Hazardous Waste Generated per Month: >2200 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other

PBR: ☐ Neutralization/WWTP ☐ Reclaim (silver) Other

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types Fluorescent Lamps

3. Hazardous Waste Transporters:

Transporter Name Freehold Cartage License Number PA-AH 0067

Transporter Name Dart Trucking License Number PA-AH 0219

Transporter Name Safety Kleen Systems License Number PA-AH 0172

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
D001, F002, F003	Waste flammable solids and liquids (solvents)	Environmental Enterprises
D001, F002, F003	Waste flammable solids and liquids (solvents)	Von Roll of America
D001, D002, F002	Lab Wastes	Permafrix

NERO
BDO
EPA - RCRA
Municipality – Hanover Twp.
Facility – B. Braun Medical

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HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 10/20/03

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS**1 2 3 4****REQUIREMENT****PA CIT.
25 PA Code****FED. CIT.
40 CFR****LINE
NO.**

1			Hazardous waste determination performed on all waste streams	262a.10	262.11	H001
1			Identification Number	262a.10	262.12	H002
1			Authorized transporters only	262a.10	262.12(c)	H003
1			Subsequent notification requirements met	262a.12(b)		H004
1			Proper manifest used	262a.10	262.21	H005
1			Manifests filled out correctly and completely	262a.20		H006
1			Manifests signed and routed properly	262a.23(a)	262.23	H007
1			Generator waste accumulated on site for 90 days or less	262a.10	262.34(a)	H008
	2		SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262a.10	262.34(e)(f)	H009
	2		SQG waste accumulated on-site never exceeds 6000 kg	262a.10	262.34(e)(f)	H010
1			Satellite accumulation requirements complied with	262a.10	262.34(c)	H011
1			Personnel training program per 265.16 complied with	262a.10	262.34(a)(4) 262.34(d)	H012
1			Manifest exception and biennial reports retained for 3 years	262a.10	262.40(a)(b)	H013
1			Specified records retained for three years	262a.10	262.40(c)	H014
1			Biennial reports submitted to the Department (LQG only)	262a.41	262.41	H015
1			Exception reporting procedures followed	262a.42	262.42	H016
1			Spill reporting procedures followed	262a.10	262.34(d)	H017
1			PPC plan developed and implemented	262a.10	262.34(a)	H018
1			Special requirements followed for international shipments	262a.10	262.50 262.60	H019
1			Source reduction strategy prepared and available (LQG only)	262a.100		H020
1			Excluded waste complies with exclusionary requirements	261a.4	261.4	H021

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**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 10/20/03

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STATUS

1 2 3 4

REQUIREMENT**PA CIT.
25 PA Code****FED CIT.
40 CFR****LINE
NO.**

				CONTAINERS (Subchapter I)			
1				Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I	262a.10	262.34	H025
1				Containers of hazardous waste in good condition	265a.1	265.171	H026
1				Containers and stored waste compatible	265a.1	265.172	H027
1				Containers kept closed except during addition or removal of wastes	265a.1	265.173(a)	H028
1				Containers managed to prevent leaks	265a.1	265.173(b)	H029
1				Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment	265a.173		H030
1				Container storage areas inspected at least weekly	265a.1	265.174	H031
1				Special requirements for ignitable or reactive and incompatible waste complied with	265a.1	265.176-177	H032
1				Proper containment and collection systems in place	265a.179		H033
1				Air emission standards complied with (AA, BB, CC)	265a.1	265.178	H034
1				Containers clearly marked with accumulation date and visible for inspection	262a.10	262.34(a)(2)	H035
1				Containers labeled "Hazardous Waste"	262a.10	262.34(a)(3)	H036
1				Containers labeled accurately identify contents	SWMA 6018.403(b) (2)		H037

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INSPECTION REPORT COMMENTS

Date of inspection October 20, 2003 Identification Number PAD 982679169
Company/Facility/Site Name B. Braun Medical, Inc.

Observations:

I conducted a routine hazardous waste generator inspection on 10/20/03 at B. Braun Medical, Inc. Steve Stancick, David Lauer and Joe Patterson of B. Braun were present during the inspection. The inspection began at 12:45 pm.

The facility manufactures medical equipment. The facility generates hazardous and residual wastes during this process. The facility main generates used solvents as hazardous waste. The facility also generates lab waste. The facility's hazardous waste include, but are not limited to, Isopropanol, Methylene Chloride, Ethanol, Butyl Acetate, TCE, and Phenol. The facility generates liquid hazardous waste, and some solid wastes, which mostly include protective equipment. The facility also generates lab packs, but none were seen onsite during the inspection.

Only one container of hazardous waste was observed in the satellite accumulation area. The drum was properly labeled and had secondary containment. The drum was in good condition. The hazardous waste storage area a few drums. All were properly labeled, had a start date and proper secondary containment. No leaks were observed. No liquid was seen in the secondary containment. The storage area was equipped with fire systems. The oldest date on a drum seen was 9/22/03.

The PPC plan was examined. The plan appears to be adequate. Manifests were examined and appear to be in order. The facility just recently had a pickup, so the amount of waste onsite is low. The training documents were examined. Training for hazardous waste handling was completed in October 2002. New training is scheduled to be done within two weeks. The facility had no new hazardous waste streams in 2003.

The hazardous and residual biennial reports (2001 and 2002) were examined and appear to be in order. The source reduction strategy was also on file at the facility.

No violations were noted during the inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Sent to Facility Date 10/22/03
Inspector (signature) Christy Ann Date 10/22/03

EVALUATION - VIOLATION - ENFORCEMENT FORM

Updated 5/03

*Handler ID Number

PA D 9 8 2 6 7 9 1 6 9

*RCRA Non-Notifier

YES ☐ NO ☒

If YES, the handler section must be completed.

*Handler Name

B. Braun Medical, Inc.

*Street

901 Marcon Blvd.

*City

Allentown

*State

PA

*Zip Code

18109

*County or County Code

Lehigh

*Contact

Steve Stancick

*UNIVERSE CHANGE REQUIRED

Yes

No

☒

i. Indicate the Facility's current Universe(s):

LQG

ii. Indicate the new RCRAInfoGenerator Universe:

LQG

SGQ

CESG

Note: All TSD activity changes must be handled by the IOR and cannot be made using this form.

Non-Handler

Closed

iii. Indicate the new transporter status:

Transporter

Non-Transporter

Check the mode of transportation:
You must check at least one of the following boxes

☐ Air

☐ Rail

☐ Highway

☐ Water

☐ Other

Check non-transporter if the facility is currently listed in RCRAInfo as a transporter AND no longer transports hazardous waste.

*EVALUATION

Add

☒

Change

Delete

*Date

Number

*Agency

*Type

*Reason

*Branch

*Person

102003

S

CEI

WM

PACSS

*AREAS OF EVALUATION (Check if Evaluated)

GGR ☒

GSC ☒

TWD ☐

DGW ☐

DOR ☐

DWP ☐

BRR ☐

FEA ☐

GLB ☒

GSQ ☒

DCH ☐

DLB ☒

DPB ☐

DIN ☐

BPS ☐

CSS ☐

GMR ☒

GEX ☒

DCL ☐

DLF ☐

DPP ☐

DIA ☐

BIS ☐

UOR ☐

GOR ☒

TGR ☐

DCP ☐

DLT ☐

DSI ☐

DPS ☐

BCE ☐

SCC ☒

GPT ☒

TMR ☐

DFR ☐

DMC ☐

DTR ☐

DOP ☐

BDT ☐

GRR ☒

TOR ☐

DGS ☐

DMR ☐

DTT ☐

DMI ☐

CAS ☐

Comments:

*OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION? (Y/N)

If Yes, fill in information below.

Agency

Number

Area

Date Determined

Agency

Number

Area

Date Determined

☐
☐
☐

☐
☐
☐

VIOLATION

Add

Change

Delete

Link to Above Evaluation? (Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

☐

Returned to Compliance

Date Determined

Priority

Branch

Person

Scheduled

Actual

Comments:

*Handler ID Number

*Handler Name

VIOLATION

Add

Change

Delete

Link to Above Evaluation? (Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

Date Determined

Priority

Branch

Person

Returned to Compliance

Scheduled

Actual

Comments:

VIOLATION

Add

Change

Delete

Link to Above Evaluation? (Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

Date Determined

Priority

Branch

Person

Returned to Compliance

Scheduled

Actual

Comments:

VIOLATION

Add

Change

Delete

Link to Above Evaluation? (Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

Date Determined

Priority

Branch

Person

Returned to Compliance

Scheduled

Actual

Comments:

ENFORCEMENT

Add

Change

Delete

Date

Number

Agency

Type

Branch

Person

Attorney Initials

Docket Number:

Penalty Type

Penalty Amount

\$.00

\$.00

Multimedia Enforcement Codes

(Check all that apply)

AIR

EPCRA

FIFIRA

SPCC

TSCA PCB

UST

UIC

WATER

WETLANDS

NOTE: To record activities for Supplemental Environmental Projects (SEPs) or to add penalty payment information, use the Supplemental Enforcement Form.

Comments:

VIOLATIONS COVERED BY ABOVE ENFORCEMENT ACTION

Agency

Number

Area

Date Determined

Agency

Number

Area

Date Determined



Pennsylvania Department of Environmental Protection

4530 Bath Pike
Bethlehem, PA 18017
October 29, 2003

Bethlehem District Office

(610) 861-2070
FAX (610) 861-2072

Hanover Township
Municipal Building
2202 Grove Road
Allentown, PA 18109

RE: B. Braun Medical, Inc.
Hanover Township
Lehigh County

Dear Mr. Pudliner:

Please find enclosed a copy of the report of an inspection performed by this District Office at B. Braun Medical, Inc. located in your municipality. A copy of the inspection report is being provided to you pursuant to the provisions of Section 1101(a)(1) of Act 101, the Municipal Waste Planning, Recycling and Waste Reduction Act of 1988.

Sincerely,

Christopher Smolar

Christopher Smolar
Solid Waste Specialist
Waste Management Program

Enclosure

SP/gh

